

January 21, 2005

Ms. Stephanie Hillmon, Assistant General Counsel  
Committee for Purchase From People Who Are Blind or Severely Disabled  
1421 Jefferson Davis Highway  
Jefferson Plaza 2, Suite 10800  
Arlington, VA 22202-3259

RE: Comments to the Proposed Rules Regarding the Javits-Wagner-O'Day  
Program

Dear Ms. Hillmon:

Alabama Institute for Deaf and Blind (AIDB), established in 1858, is a state funded program comprised of multiple entities including the Alabama School for the Blind, the Alabama School for the Deaf, the Helen Keller School, the E.H. Gentry Technical Facility, nine regional centers, and the Alabama Industries for the Blind. It is governed by a Board of Trustees appointed by the Governor of Alabama. AIDB is audited annually by the State of Alabama Department of Audit, and is subject to numerous internal, state and federal regulations which include periodic compliance reviews. Compensation of executive staff is regulated by the State of Alabama and AIDB personnel policies with salaries based upon internal and external compensation surveys. Benefits provided to AIDB employees are dictated primarily by the State of Alabama. Employees of the Alabama Industries for the Blind are state employees covered by the Fair Dismissal Act and subject to state educational regulations.

AIDB appreciates the opportunity to comment on this proposed rule, and offers the following observations:

- The proposed rule change has the very real potential of creating a conflict with existing state regulations, and certainly would duplicate much of the regulatory activity mandated by existing local, state, and federal laws and policies. The value of additional reporting requirements seems minimal and would certainly add administrative and financial burdens that would require shifting resources from direct services to children and adults served by AIDB.
- While AIDB totally subscribes to sound and responsible board governance standards, the potential conflict between this proposed rule and existing state regulations governing a state appointed Board of Trustees could place AIDB in an untenable position.
- As a state entity whose actions are open to all publics, the compensation of top executives is a matter of public record. Compensation benefits are dictated primarily by the State of Alabama through the legislative and executive processes, and therefore the imposition of federal guidelines could again create conflict with existing internal and state personnel policies.

For the reasons stated above, and for reasons which AIDB might submit through future comments, AIDB requests that the Committee for Purchase From People Who Are Blind Or Severely Disabled carefully consider the implications of imposing such regulations on a state funded agency.

Respectfully Submitted,

Billy J. Sparkman, Executive Director  
Alabama Industries for the Blind

BJS/ggh